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**From:** Steven D. Bennett [sbennett@thehcpa.org]  
**Sent:** 10/22/2020 2:55:03 PM  
**To:** Parsons, Doug [Parsons.Douglas@epa.gov]; Douglas Troutman [DTroutman@CleaningInstitute.org]; Wheeler, Cindy [Wheeler.Cindy@epa.gov]  
**CC:** Kathleen Stanton [KStanton@CleaningInstitute.org]; Nathan E. Sell [NSell@CleaningInstitute.org]  
**Subject:** RE: Exposure Data for Consumer Uses of 1,4-dioxane  
**Attachments:** ATT00001.txt; Comiskey et al (2017) Exposure soaps, cosmetics, air care.pdf

Doug,

Still awaiting additional feedback on several of the questions but I wanted to provide some input to possibly assist.

One suggestion for handwashing is some recent and authoritative data were developed to support the RIFM is the Crème aggregate exposure model (see Comiskey et al., 2017) (attached)

There was also a suggestion to refer to the EPA Exposure Factors Handbook (Tables 16-37, 16-38, 17-12, 17-37) and associated references that are relevant (I expect these to already be incorporated in risk evaluation but were not explicitly noted in DRE)

Handwashing:

- European Commission SCCS Notes of Guidance (see Tables 3 and 4)  
[https://ec.europa.eu/health/sites/health/files/scientific\\_committees/consumer\\_safety/docs/sccs\\_o\\_224.pdf](https://ec.europa.eu/health/sites/health/files/scientific_committees/consumer_safety/docs/sccs_o_224.pdf)  
Manual Dishwashing
- European Union AISE (2015) Table of Habits and Practices for Consumer Products in Western Europe, [https://www.aise.eu/documents/document/20150602150650-aise\\_sceds\\_supportingexplanation\\_document\\_may2015\\_v1.pdf](https://www.aise.eu/documents/document/20150602150650-aise_sceds_supportingexplanation_document_may2015_v1.pdf)
- WHO EHC 242 on Dermal Exposure, [https://www.who.int/ipcs/publications/ehc/ehc\\_242.pdf](https://www.who.int/ipcs/publications/ehc/ehc_242.pdf)
- Weegels ME & van Veen MP (2001) Variation of consumer contact with household products: a preliminary investigation. Risk Anal **21**(3):499–511.

**Steven Bennett, Ph.D.**

*Senior Vice President, Scientific & Regulatory Affairs*

*Floor Care Division Staff Executive*

*Pest Management Products Division Staff Executive*

*HCPA Consumer Product Ingredients Dictionary*

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**From:** Parsons, Doug <Parsons.Douglas@epa.gov>

**Sent:** Tuesday, October 20, 2020 10:28 AM

**To:** Douglas Troutman <DTroutman@CleaningInstitute.org>; Steven D. Bennett <sbennett@thehcpa.org>; Wheeler, Cindy <Wheeler.Cindy@epa.gov>

**Cc:** Kathleen Stanton <KStanton@CleaningInstitute.org>; Nathan E. Sell <NSell@CleaningInstitute.org>

**Subject:** Exposure Data for Consumer Uses of 1,4-dioxane

Hello Kathleen, Steve, Doug, and Nathan

Thanks again for all the information to date. We are continuing to deliberate on 1,4-dioxane as part of the final risk evaluation under TSCA.

We have a few questions that are pasted below regarding consumer exposure scenarios for surface cleaners, dish soap, dishwashing detergent and laundry detergent.

Can you please take a look and let us know if you have answers to these questions, and if so, we would be very interested in obtaining the information as soon as possible. We are also glad to organize a call if that would be useful. Please let us know.

Thanks, doug

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1. Do you have any existing measured concentration levels or known concentration ranges of 1,4-dioxane in finished consumer products, specifically dishwasher detergent, dish soap, laundry detergent, and surface cleaners?
2. Do you have any existing survey or other data on specific product types (e.g., detergents, cleaners, dish soap) that can be used to inform duration or frequency of cleaning or washing activities?
3. Do you have any existing survey or other data on specific product types (e.g., detergents, cleaners, dish soap) that can be used to inform the amount of product used per day or per activity and/or the level of dilution typical for products used in hand washing activities?

Douglas W. Parsons  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
1201 Constitution Ave NW  
Washington, D.C. 20460  
Phone: (202)564-0341  
Email: [parsons.douglas@epa.gov](mailto:parsons.douglas@epa.gov)